

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(READING)**

In re:

Richard Anthony Rutgers  
Elva Mae Rutgers

Debtors

Chapter 13

Case No.: 19-17402-pmm

**CERTIFICATION OF NO OBJECTION**

TO THE HONORABLE PATRICIA M. MAYER, UNITED STATES  
BANKRUPTCY JUDGE

I, Angela C. Pattison, Esquire, of the law firm of Hill Wallack LLP, do hereby certify that:

1. On **October 27, 2022**, Hill Wallack LLP (“Hill Wallack”), counsel to Wilmington Trust, National Association, not in its individual capacity, but solely as trustee of MFRA Trust 2016-1 (“Movant”) filed a Certification of Default of Stipulation with Debtor (“Default”) regarding property located at 5120 Curly Horse Drive, Center Valley, PA 18034 [Doc. # 91] in the above-entitled matter.

2. On **October 27, 2022**, a copy of the Default was served upon the appropriate parties in interest as more fully set forth in the Service List filed with the Default.

3. On **November 2, 2022**, the Debtors, via their counsel, filed an Objection to Default [doc # 92] and this court scheduled a hearing in this matter. The current hearing date is **March 2, 2023**.

4. On **February 26, 2023**, the Debtors, via counsel, filed a Praecipe to Withdraw Debtor’s Objection to Default [doc # 103].

5. Accordingly, Movant’s Default should no longer be treated as a contested matter.

**WHEREFORE**, Wilmington Trust, National Association, not in its individual capacity, but solely as trustee of MFRA Trust 2016-1, hereby respectfully requests that this Court enter an Order Granting Relief

From Stay.

Date: February 27, 2023

By: /s/ Angela C. Pattison  
Angela C. Pattison, Esq.,  
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Hill Wallack, LLP  
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**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of  
Certification of No Objection to Certification of Default of Stipulation with Debtor of  
Wilmington Trust, National Association, not in its individual capacity, but solely as trustee of MFRA  
Trust 2016-1 in the manner indicated below:

Richard Anthony Rutgers  
5120 Curly Horse Drive  
Center Valley, PA 18034  
**Debtor**

Elva Mae Rutgers  
5120 Curly Horse Drive  
Center Valley, PA 18034  
**Joint Debtor**  
**Via Regular Mail**

Scott F. Waterman  
2901 St Lawrence Ave,  
Suite 100  
Reading, PA 19606  
**Chapter 13 Trustee**

Office of the U.S. Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106  
**United States Trustee**

KEVIN K. KERCHER  
Law Office of Kevin K. Kercher,  
Esq, PC  
881 Third Street  
Suite C-2  
Whitehall, PA 18052  
**Debtor's Attorney**

Date: February 27, 2023

By: /s/ Angela C. Pattison, Esq.